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Attorneys for Plaintiff JENS ERIK SORENSEN,
as Trustee of SORENSEN RESEARCH AND
DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of)	Case No. CV 075525 JSW
SORENSEN RESEARCH AND)	
DEVELOPMENT TRUST,)	AFFIDAVIT OF MELODY A.
)	KRAMER IN SUPPORT OF
Plaintiff)	REQUEST FOR ENTRY OF
v.)	DEFAULT and DEFAULT
)	JUDGMENT AGAINST
FIRST INTERNATIONAL DIGITAL,)	DEFENDANT FIRST
INC. an Illinois corporation; and DOES 1-)	INTERNATIONAL DIGITAL, INC.
100,)	
)	
Defendants.)	

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1 I, MELODY A. KRAMER, declare:

2 1. I am not a party to the present action. I am over the age of eighteen. I
3 have personal knowledge of the facts contained within the following paragraphs, and
4 could and would competently testify thereto if called as a witness in a court of law.

5 2. At all times relevant herein I have been an attorney for Defendant
6 Sorensen Research and Development Trust ("SRDT"), Plaintiff in the above-
7 captioned matter.

8 3. This Declaration is being submitted in conjunction with Plaintiff's
9 Request for Default and Default Judgment Against Defendant First International
10 Digital, Inc.

11 4. The Complaint in this matter requested a sum certain for patent
12 infringement, specifically, One Million Five Hundred Thousand Dollars
13 (\$1,500,000.00) (see paragraph 113 of allegations and paragraph f of Prayers for
14 Relief).

15 5. Plaintiff is entitled to the requested dollar amount based upon
16 calculations of reasonably royalties on sales of the accused infringing products
17 given to Plaintiff by First International Digital, Inc. pre-litigation.

18 6. In addition, Plaintiff has expended \$356.96 in costs (\$350.00 filing fee,
19 and \$6.96 certified mail service fee).

20 7. Furthermore, Plaintiff's counsel (the undersigned) has expended 6.7
21 hours at a reasonable hourly rate of \$375.00/hour in preparing the pleadings in this
22 case, including this Request for Default, and reviewing other court filings for a total
23 attorney fee amount of \$2,512.50.

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1
2 SWORN TO under penalty of perjury of the laws of the State of California
3 and the United States, this 12th day of December, 2007.
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5
6 /s/ Melody A. Kramer

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Melody A. Kramer, Esq.
9 Attorney for Plaintiff
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